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DEPARTMENT OF COMMERCE AND ECONOMIC DEVELOPMENT

ALASKA PUBLIC UTILITIES COMMISSION

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May 6, 1996

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Mr. William Caton

Acting Secretary

Federal Communications Commission

1919 M Street, N.W.

Room 222

Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: In the Matter of Federal-State Joint Board on Universal Service
CC Docket 96-45

Dear Mr. Caton:

Transmitted herewith on behalf of the Alaska Public Utilities Commission are the original and eleven copies of the "Reply Comments of the Alaska Public Utilities Commission" in the above-referenced proceeding.

Please feel free to contact me if you have any questions.

Sincerely,



Don Schröder
Chairman

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

**Federal-State Joint Board on
Universal Service**

CC Docket No. 96-45

**Reply Comments of the
Alaska Public Utilities Commission**

Date: May 6, 1996

Don Schroer, Chairman
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Executive Summary

The Alaska Public Utilities Commission (APUC) recommends that telecommunications support for high-cost, rural and insular areas of the nation be provided, in a fair manner, consistent with the provisions of the Telecommunications Act of 1996 (The Act) that require services included in the definition of universal service bear no more than a reasonable share of common and joint costs of the facilities used to provide those services. Support must be sufficient and include provisions to fund necessary infrastructure changes and to provide affordable services to all customers regardless of geographic location. Efforts to make the funding mechanism more competitively neutral should not lead to rate increases. Use of support funds should be tracked to ensure that the public obtains the intended benefits of any support mechanisms. Proposals that limit funding to only the primary line of the subscriber require further review.

The APUC agrees with those commentators who recognize that there are differences in value, quality, and scope of local services between urban and rural areas of the nation. To ensure comparability in services between urban and rural areas, it may be necessary to provide rural customers with more support and services than the five core services proposed in the Notice of Proposed Rulemaking in this proceeding. If key services cannot soon be provided in rural areas, the Federal Communications Commission (FCC) may wish to consider requiring provision of services at regional centers.

1 The APUC believes that the concept of affordability must
2 consider state regional income, the total price of telecom-
3 munications services, penetration levels, cost of living, local-
4 calling-area size, current rate levels, and other regional
5 effects.

6 The FCC should consider requiring that schools, libraries,
7 and health-care providers be billed services at the billing
8 utility's lowest available contract or tariffed rate, with
9 discounts given, if necessary to reach a benchmark rate. A life-
10 line support mechanism may be needed for those areas with unusual
11 circumstances where the standard discounted rate is not
12 affordable.

13 The APUC opposes any increases to the Subscriber Line Charge
14 and suggests that this charge become a responsibility of the
15 interstate interexchange carriers, to allow the market to deter-
16 mine how this cost should be recovered.

17 The APUC opposes those proposals that would restrict the
18 decisionmaking responsibility delegated to states under The Act.
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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)
)

Reply Comments of the
Alaska Public Utilities Commission

The Alaska Public Utilities Commission (APUC) encourages the Federal Communications Commission (FCC) to adopt regulations on the universal service issue that ensure delivery of essential services to all subscribers and promote the public interest. The APUC provides the following comments in response to the April 1996 filings in CC Docket No. 96-45.

Funding Issues and Mechanisms for High-Cost, Rural, and Insular Areas

(1) Support must be adequate to meet need and be developed in a fair manner: Several commentators argued that support funding should be determined using a forward-looking, estimated, incremental cost analysis or variations of that concept.¹ The FCC should adopt only a funding methodology that recognizes that local rates should not shoulder an undue portion of the utility's joint and common costs. Consistent with the Telecommunications Act of 1996 (The Act), universal service should bear no more than a reasonable share of these costs. (Section 254(k).) Adequate and sufficient support should also be provided to ensure that whatever

¹For example, see comments of AT&T Corp. (AT&T); General Communication, Inc. (GCI); MCI; and National Association of State Utility Consumer Advocates (NASUCA).

1 joint and common costs are assigned to local customers are
2 affordable.

3 The principle under The Act at Section 254(b)(5) that the
4 high-cost mechanism must be "sufficient" requires that support be
5 based on real-world conditions. Any costing model must consider
6 all material costs that may affect service, including regional
7 high-cost factors such as those faced in Alaska (e.g., harsh
8 climate, lack of roads). The failure to consider such regional
9 costs will lead to inadequate levels of support.² Utilities
10 receiving support should have the ability to (a) demonstrate that
11 any national costing model provides inadequate funding given local
12 conditions and (b) seek appropriate relief.

13 In addition, if a forward-looking, incremental model is
14 adopted, the FCC should create provisions under the model to
15 recognize that small local exchange carriers do not fit the
16 standard Tier 1 model network structure. For example, many small
17 local exchange carriers in Alaska currently share advanced
18 switching technology with larger carriers (a fact that is
19 recognized by Congress and addressed in The Act at Section 259,
20 Infrastructure Sharing). As a result, these small carriers will
21 have different cost characteristics that should be recognized by
22 any costing model that is used.

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25 ²See comments of the Staff of the Indiana Utility Regulatory
26 Commission at 8: "The proposed proxy models fail to recognize the
costs of providing local exchange service in specific areas - a
significant flaw"

1 (2) Efforts to make the system more competitively neutral
2 should not lead to rate increases: The APUC agrees with those who
3 filed comments in this proceeding that the FCC should not adopt
4 mechanisms that increase competition but lead to rate increases.³
5 Competition should, among other things, lead to efficiency
6 improvements and not just result in cost shifting among customers.
7 If rates go up for those with the least-competitive choice,
8 subscribership will decline. The Senate Report on S. 652 has made
9 it clear that "any action to reduce or eliminate support
10 mechanisms shall only be done in a manner consistent with the
11 obligation to preserve and advance universal service for all
12 Americans." (Senate Report No. 104-23, *supra*, at 26.)

13 (3) Any high-cost support method must fund the infra-
14 structure: Support should be available to fund infrastructure
15 changes necessary to make essential services available to the
16 customer.⁴ Cost support is insufficient and a wasted effort if
17 it merely provides the customer with an access line but the
18 customer cannot use the line to obtain essential services due to
19 limitations in the overall telecommunications network. For
20 example, support would be insufficient if it provided a customer
21 with affordable local modem access to the 25 customers in the
22 customer's small local calling area but failed to provide for
23 infrastructure changes necessary to remove limitations in the toll
24

25 ³See comments of NASUCA at 4 and comments of the Idaho Public
Utilities Commission at 4.

26 ⁴See comments of the Alaska Library Association (ALA) at 4-5.

1 network that prohibit the customer from accessing the rest of the
2 United States.

3 (4) All customers require affordable rates, not just
4 residential customers: The APUC disagrees with the commentators who
5 would limit support to residential customers.⁵ Under The Act, all
6 customers (residential and business, urban and rural) are required
7 to have affordable rates, with the goals of geographic ubiquity:⁶

8 (3) ACCESS IN RURAL AND HIGH COST AREAS -
9 Consumers in all regions of the Nation, including
10 low-income consumers and those in rural, insular, and
11 high cost areas, should have access to telecom-muni-
12 cations and information services, including inter-
13 exchange services and advanced telecommunications and
information services, that are reasonably comparable to
those services provided in urban areas and that are
available at rates that are reasonably comparable to
rates charged for similar services in urban areas.
(The Act, Section 254(b)(3).)

14 The APUC believes that support for affordable service should not
15 be limited to residential local exchange service.

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23 ⁵See comments of the Florida Public Service Commission (FPSC)
24 at 7.

25 ⁶See the comments of the American Association of Retired
26 Persons, Consumer Federation of America, and Consumers Union
(AARP) at 7. See comments of the Competitive Telecommunications
Association (CTA) at 7.

1 (5) Track Use of Funds: The APUC agrees with the comments
2 of Pacific Telecom, Inc. (PTI), that there should be annual
3 accountability and reporting standards that identify the uses of
4 universal service fund proceeds.⁷

6 (6) Further review is required before adopting a proposal
6 to limit support to a single line to each household: Some
7 commentors propose that universal service support should provide
8 funding for only the primary access line to a household even
9 though utilities as a common practice wire more than one physical
10 line to each location.⁸ The APUC believes that several issues
11 must be further explored before such a proposal is adopted.
12 First, the proposal does not specify what type of "line" (e.g.,
13 fiber optic, coax, or copper) should be funded. Funding one line
14 per household may provide different quality of service to the end
15 customers depending upon whether the customers are served by fiber
16 or copper wire.

17 Second, there are no allocation procedures to identify how
18 to determine the costs for the primary "line" versus any addi-
19 tional lines (or capacity). Without such allocation procedures,
20 the "single-line" proposal cannot be fully evaluated, and it
21 cannot be determined whether the price of the second "line" will
22 rise to unaffordable levels or will rise to the point that demand
23 is suppressed leading to higher overall rates for all customers.

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25 ⁷See comments of PTI at 3.

26 ⁸For example, see comments of the Illinois Commerce
Commission at 5.

1 Developing "single-line" cost allocation rules would likely be a
2 daunting, controversial task.

3 Third, providing two "lines" to each household allows a back
4 up in case of failure of the primary "line" and may reduce
5 construction costs and installation time if the customers ever
6 seek a second circuit, raising quality-of-service questions.
7 Therefore, the proposal to fund only the first "line" to a
8 household should be further reviewed.

9
10 Services To Be Supported

11 (1) Rural customers may need additional support and
12 services: The APUC believes that many of the proposals filed in
13 this proceeding do not comply with Section 254(b)(3) of The Act
14 that requires that rural, insular, and high-cost areas have access
15 to telecommunications and information services, including inter-
16 exchange service and advanced telecommunications services, that
17 are reasonably comparable to those in urban areas and that the
18 services are available at rates that are reasonably comparable to
19 rates charged for similar services in urban areas.⁹

20 Rural and urban local services are now dissimilar because
21 they differ in quality, availability of services, functions
22 provided, and scope of calling areas. Rural areas often have

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24 ⁹For example, several commentators would not provide funding to
25 interexchange services, while others contend that the basic core
26 services provide all essential functions and access to critical
fire, police, and medical facilities. See comments of AT&T at 12-
13; GCI at 5-7; Bellsouth Corporation, Bellsouth Telecommunica-
tions, Inc. (Bellsouth), at 6.

1 higher rates but smaller calling areas than urban areas. Rural
2 areas, especially those in Alaska, often do not have local tele-
3 communications access to information services via modem (including
4 the Internet), fire, police, medical emergency, and other services
5 that are taken for granted in the more urban areas.¹⁰

6 Universal service (and sufficient funding) should therefore
7 be provided to allow a reasonably adequate local calling area in
8 order for customers to have affordable access to telecommunica-
9 tions and information services that they need and that are
10 reasonably comparable to those services provided to urban areas.
11 In Alaska, toll service is a necessary component to provide full
12 participation in the telephone network and useful access to
13 services included in the definition of universal service. For
14 example, most rural Alaska customers must make an intrastate toll
15 call to have access to a doctor, emergency services, and stores
16 other than the local village store, if there is one.

17 (2) Provide Advanced Services: Section 254(b)(3) requires
18 that reasonably comparable access to advanced services and
19 information services be available in all areas of the nation. The
20 FCC should therefore broaden the definition of universal service
21 beyond its initial five core services (e.g., "POTS")¹¹ as proposed
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25 ¹⁰See comments of the APUC. See comments of the ALA at 9.

26 ¹¹"POTS" refers to "Plain Old Telephone Service".

1 in the NPRM.¹² Several of the filed comments demonstrate that
2 modem and Internet access, while commonly deployed urban services,
3 are difficult or expensive to obtain in some rural areas.¹³

4 For example, the Rural Utilities Service (RUS) perceives that
5 the ability to provide digital 28.8 kilobytes-per-second (kbps)
6 modem service should be an intrinsic characteristic of the local
7 network and is possible over the "short loops" that "comprise the
8 overwhelming majority of suburban and urban areas."¹⁴ In urban
9 areas, customers have significant and flexible use of 28.8 kbps
10 transmission to contact several information services within their
11 local area. In comparison, in Alaska most rural communities are
12 distant from and have no road access to other rural and urban
13 locations. These rural communities are dependent upon inter-
14 exchange services to provide access to Internet and other
15 information services. In Alaska, the facility of 28.8 kbps modem
16 access on a local line is often relatively useless without
17 comparable toll access because of the extremely limited-size local
18 calling areas.¹⁵

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20 ¹² See comments of the Association of the Bar of the City of
21 New York Administrative Law Committee at 17.

22 ¹³ See comments of Kinko's Inc., at i-iii, regarding provision
23 of free Internet services to Americans with computer facilities;
24 and RUS at 10, regarding modem usage in the United States. See
also comments of Distance Delivery Consortium (DDC) at 1, and ALA.
at 9.

25 ¹⁴ See comments of RUS at 10.

26 ¹⁵ See comments of the ALA at 9, DDC at 1-2, State of Alaska
(continued...)

1 (3) Regional Centers: If carriers cannot quickly modernize
2 their facilities to provide needed services in rural, high-cost,
3 and insular areas, then efforts should be made to provide
4 community access centers so that some point of access to essential
5 services, including the Internet, can be made available in each
6 community. Comments from various library associations would
7 suggest that libraries would be available for the regional center
8 function.¹⁶

9 (4) Rate deaveraging and support to AT&T: In its comments
10 AT&T seeks financial support to provide geographic rate averaging
11 in some high-cost areas that it serves.¹⁷ If the FCC grants such
12 support, AT&T should be required to appropriately reduce its
13 rates. The APUC believes, however, that AT&T has not demonstrated
14 that it needs support to preserve geographic rate averaging.

15 Affordability to All Customers

16 (1) The concept of affordability to all customers should be
17 broad based: The APUC agrees with the comments that support the
18 concept that rate affordability should consider state regional
19 income, the total price of telecommunication service, penetration
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23 _____
24 ¹ ³ (c o n t i n u e d)
at 11, and RUS at 10-11.

25 ¹⁶For example, see comments of the Library of Michigan at i.

26 ¹⁷See comments of AT&T at 12, n. 15.

1 levels in the area, cost of living, local-calling-area size,
2 current rate levels, and state rate setting policies.¹⁸

3 (2) Do not use a percentage of the national median income
4 to determine affordability: Proposals that merely consider
5 national median income to determine affordability should not be
6 adopted. Specifically, Keystone proposes that an affordability
7 benchmark (\$28/month) be set at about 1 percent of the national
8 median income.¹⁹ Many places in rural Alaska have average incomes
9 that fall well below the national average. Given this circum-
10 stance, the \$28/month rate would appear too high as a gauge of
11 affordability. For example, a \$28/month phone bill represents
12 about 7 percent of the average annual income for a household in
13 Birch Creek, Alaska. At this level, citizens in Birch Creek may
14 not be able to afford phone service. If a percentage of average
15 income is used as the benchmark of affordability, the percentage
16 should be based on state regional average income.

17 (3) The national average rate for service is not, by itself,
18 a good indicator of affordability: Some commentators suggest that
19 the national average rate be used as an indicator of telephone
20 affordability.²⁰ The APUC believes that the national average rate,
21

22 ¹⁸Several parties advocate one or all of the above criteria
23 of affordability. See comments of the California Department of
24 Consumer Affairs at 18-19; AARP at 1, 6; Keystone at 8; NASUCA at
25 1, 4; and the New York State Department. of Public Service at 2-5.

26 ¹⁹See comments of Keystone at 8.

²⁰See comments of the FPSC at 5. MCI, at 11, also suggests
(continued...)

1 by itself, is not a good indicator of affordability. Components
2 of the local rate (e.g., touch-tone), quality of service, value
3 of service, and size of the local calling area vary from location
4 to location, making it difficult to develop a valid national
5 average rate. Furthermore, as previously discussed, affordability
6 cannot be gauged merely by price but is governed by customer
7 income, cost of living, and other factors.

8 Schools, Libraries, and Health Care Providers

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10 (2) Proposal for provision of discounts: The APUC agrees
11 with those commentators who suggest that schools, libraries, and
12 health-care providers should be billed for service at the billing
13 utility's lowest available contract or tariffed rates for their
14 region.²¹ To ensure that services are universally available,
15 states could develop benchmark rate schedules that would allow
16 interstate funding for schools, libraries, and health-care
17 providers to cover the portion of the bill above the benchmark
18 rates.

19 To encourage incentives for efficiency, the FCC may also wish
20 to consider requiring the schools, libraries, and health-care
21 providers to bear a portion (possibly 10 percent) of the cost
22 difference between the benchmark rate and the billed rate. When

23
24 ²⁰(...continued)
25 a targeted rate of \$20/month be employed.

26 ²¹For example, the American Libraries Association, at 1,
proposes that rates be based on the lowest tariff rate or the
total service, long-run incremental costs.

1 developing these benchmark rates, the APUC suggests that
2 consideration be given to providing mileage-insensitive rates.

3 (2) Lifeline support: Schools, libraries, and health-care
4 providers will sometimes face unusual circumstances that make the
5 discounted rate unaffordable. The APUC agrees in concept with the
6 National School Board, et al. (NSB), that schools, libraries, and
7 health-care providers that can document extreme need should
8 receive lifeline-like support.²²

9
10 Subscriber Line Charges (SLC) and Carrier Common Line Charges (CCLC)

11 (1) Do not increase the SLC: The APUC agrees with NASUCA
12 that the SLC represents a local rate increase to customers who
13 have no means of economizing to avoid the charge and minimize
14 expenses.²³ Interexchange carriers (IXCs) that employ the local
15 loop for provision of their services should pay a fair share of
16 local loop costs. The free use of the local loop by IXCs
17 constitutes an unjustified subsidy and an unreasonable sharing of
18 joint and common costs.

19 (2) If the SLC is increased, toll rates should decrease:
20 Customers should not be required to experience a rate increase,
21 through higher SLC charges, without obtaining some benefit. As
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24 ²²See comments of the NSB at 23. The APUC has not fully
25 evaluated all of the details proposed by the NSB on this matter
26 and, therefore, can only endorse the proposal in concept.

²³See comments of NASUCA at 15, 23.

1 a result, any increase in SLC should result in a mandatory
2 decrease in IXC rates.²⁴

3 (3) Replace the SLC mechanism: The APUC supports those
4 comments that propose transfer of the responsibility to pay the
5 interstate SLC to the IXCs to allow the market to determine how
6 such costs should ultimately be recovered.²⁵ If necessary, the
7 IXCs could themselves adopt end-user charges similar to the SLC.
8 In the alternative, NARUC has suggested other options available
9 to the FCC to reduce the CCLC instead of increasing the SLC.²⁶

10 Preemption

11 The FCC should not adopt proposals that restrict the
12 decisionmaking responsibility delegated to the states by The Act.
13 For example, Section 214(e)(2) allows state commissions to
14 designate carriers as eligible carriers for a specific service
15 area designated by the state commission. New entrants, therefore,
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23 ²⁴See comments of Bellsouth at 12.

24 ²⁵See comment of the Idaho Public Utilities Commission, at 17,
25 and the comments of the State of Maine Public Utilities
Commission, et. al.

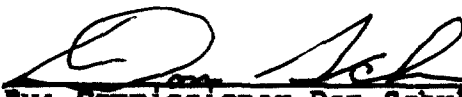
26 ²⁶See comments of NARUC 17.

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1 should not be allowed to determine their own study areas for
2 eligibility purposes.²⁷

3
4 RESPECTFULLY SUBMITTED this 6th day of May, 1996.

5 BY DIRECTION OF THE COMMISSION

6
7 
8 By: Commissioner Don Schröer, Chairman
9 Alaska Public Utilities Commission

10 cc: William F. Caton
11 Acting Secretary
12 Federal Communications Commission

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14 Attached List
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26 ²⁷See comments of GCI at 11 which propose that competitors
alone be able to determine their own study areas.

SERVICE LIST
CC DOCKET 96-45

May 3, 1996
Page 1 of 45

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SERVICE LIST (CONTINUED)
CC DOCKET 96-45

May 3, 1996
Page 2 of 45

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SERVICE LIST (CONTINUED)
CC DOCKET 96-45

May 3, 1996
Page 4 of 45

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SERVICE LIST (CONTINUED)
CC DOCKET 96-45

May 3, 1996
Page 5 of 45

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SERVICE LIST (CONTINUED)
CC DOCKET 96-45

May 3, 1996
Page 6 of 45

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CC DOCKET 96-45

May 3, 1996
Page 7 of 45

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